

## **EXHIBIT 2**

## Leigh O'Dell

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**From:** Leigh O'Dell  
**Sent:** Wednesday, June 13, 2018 9:54 AM  
**To:** Mark Silver; Chris Tisi  
**Cc:** Michelle Parfitt; Richard D. Meadow; Chris Placitella  
**Subject:** RE: MDL - Imerys "Lanzo Box" Inventory

Mark, as of today, an additional 203 samples have been disclosed, nearly all from years for which no samples were previously made available. The number of Imerys samples has nearly doubled. We are digesting this information as quickly as possible, but in order to make an informed decision about which samples to split, we need to know the universe we are dealing with. What is your best estimate of when additional information will be provided to us? Thanks.

Leigh

## P. Leigh O'Dell

Principal

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**From:** Mark Silver <MSilver@coughlinduffy.com>  
**Sent:** Wednesday, June 13, 2018 8:45 AM  
**To:** Chris Tisi <ctisi@levinlaw.com>  
**Cc:** Leigh O'Dell <Leigh.ODell@BeasleyAllen.com>; Michelle Parfitt <mparfitt@ashcraftlaw.com>  
**Subject:** RE: MDL - Imerys "Lanzo Box" Inventory

Chris,

There is only one inventory outstanding. We are still working on it and trying to confirm whether those samples are samples relevant to the MDL. We are working as fast as we can. In the interim, since the PSC knows that it wants splits of other samples, I suggest you identify which samples you want of the inventories already provided, so we can get the splits set up as soon as possible.

Mark



Mark K. Silver | Partner

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**From:** Chris Tisi [<mailto:ctisi@levinlaw.com>]  
**Sent:** Friday, June 8, 2018 7:48 PM  
**To:** Mark Silver <[MSilver@coughlinduffy.com](mailto:MSilver@coughlinduffy.com)>  
**Cc:** Leigh O'Dell ([Leigh.ODell@BeasleyAllen.com](mailto:Leigh.ODell@BeasleyAllen.com)) <[Leigh.ODell@BeasleyAllen.com](mailto:Leigh.ODell@BeasleyAllen.com)>; Michelle Parfitt <[mparfitt@ashcraftlaw.com](mailto:mparfitt@ashcraftlaw.com)>  
**Subject:** Re: MDL - Imerys "Lanzo Box" Inventory

Thanks Mark.

Couple questions:

When do you think you will have the inventory complete for the samples with your former employee that you mentioned yesterday? We will want to figure that into our thinking of testing going forward

Also, it was our understanding that you were going to supplement some of the information in the "asbestos litigation" boxes. Assuming I am correct, can you let us know when you think that'll be complete as those too would figure into our thinking

Let us know whether you think we should discuss these again next week.

Have a good weekend  
Chris

Sent from my iPhone

On Jun 8, 2018, at 12:33 PM, Mark Silver <[MSilver@coughlinduffy.com](mailto:MSilver@coughlinduffy.com)> wrote:

Chris/Leigh/Michelle,

Following up on yesterday's meet and confer, attached is the "Lanzo Box" Inventory. I am ready to set up splits of these and other samples as soon you identify which ones you want.

Mark

<image001.jpg>

Mark K. Silver | Partner

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<Lanzo Box Inventory.pdf>

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